



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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6470
Ser OEM/ 000893
10 MAY 2004

From: Commanding Officer, Navy Environmental Health Center

Subj: NAVAL RADIOACTIVE MATERIALS PERMIT (NRMP) INFORMATION NOTICE
2004-04: RECENTNESS OF TRAINING FOR AUTHORIZED USERS, AUTHORIZED
MEDICAL PHYSICISTS AND AUTHORIZED NUCLEAR PHARMACISTS

Ref: (a) Title 10, Code of Federal Regulations (CFR), Part 35.59: Recentness of Training
(b) Naval Radioactive Materials Permit (NRMP) Information Notice 2003-05:
Authorized User Approval and Notification Procedures, 23 Jun 03

Encl: (1) NRC Regulatory Issue Summary 2003-17: Complying With 10 CFR 35.59,
Recentness of Training (STP-03-080), 15 Oct 03

1. This information notice is issued to provide clarification regarding the recentness of training requirement in reference (a), applicable to authorized users (AUs), authorized medical physicists (AMPs) and authorized nuclear pharmacists (ANPs). Per the U. S. Nuclear Regulatory Commission (NRC), training and experience specified in Subparts B, D, E, F, G, H and J of 10 CFR Part 35, must have been obtained within the 7 years preceding the date of application or the individual must have had related continuing education and experience since the required training and experience was completed.

2. To clarify the above requirements, the NRC, in Regulatory Issue Summary (RIS) 2003-17 appended as Enclosure (1), provided guidance for permittees seeking to have individuals identified as AUs, AMPs, and ANPs, under the following conditions:

a. The individual is certified by a specialty board recognized by the NRC, but the board certification was received beyond the 7-year time frame allowed in 10 CFR 35.59; and

b. The individual is not currently identified on a medical-use license nor permit as an AU, AMP, or ANP, as appropriate in 10 CFR 35.13(b)(4).

3. In cases where the above conditions are met, the NRC:

a. Clarifies that for limited-specific, Type B broad-scope, and Type C broad-scope medical-use licensees, only the NRC with input from the Advisory Committee on the Medical Uses of Isotopes (ACMUI), as necessary, may determine what constitutes adequate related continuing training and experience, for purposes of complying with 10 CFR 35.59, Recentness of Training;

b. Describes the criteria NRC uses to evaluate related continuing training and experience, under 10 CFR 35.59;

c. Describes the information NRC reviews to make the determination; and

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- d. Describes NRC's expectations for Type A broad-scope medical-use licensees.
4. For those cases of recentness of training that require NRC review and approval as described above, the entire qualification package for the AU, AMP or ANP being considered, shall be forwarded to NAVENVIRHLTHCEN. Once it is determined that the submission is complete and indeed requires NRC approval, NAVENVIRHLTHCEN will forward the package to the NRC via the Naval Radiation Safety Committee (NRSC). Note that this process can take considerable time to complete; therefore, it is highly recommended that all required documentation be forwarded to NAVENVIRHLTHCEN as expeditiously as possible.
5. The above requirements for recentness of training are in addition to the already existing procedures for approval and notification of authorized users, in reference (b).
6. It should also be noted that the "alternate" training and experience requirements found in Subpart J of 10 CFR Part 35 will be discontinued on 24 October 2004. At that time, all training and experience shall be in accordance with the "new" Part 35 requirements in Subparts B, D, E, F, G and H.
7. The Radiation Safety Officers shall ensure that their Radiation Safety Committee is briefed on this information notice. Verification of this briefing will be made during subsequent NAVENVIRHLTHCEN inspections of Naval Radioactive Material Permit (NRMP) programs.
8. This letter shall be maintained on file with your NRMP and shall be considered as an integral part of your NRMP.
9. For additional information, please contact LCDR Brian Pomije, MSC, USN, Radiation Health Team Leader at DSN: 377-0766/0767 or (757) 953-0766/0767, facsimile (757) 953-0685, or E-mail at pomijeb@nehc.med.navy.mil.



B. D. Pomije
By direction

Distribution:
All Medical NRMP holders

Copy to:
OPNAV (N455)
BUMED (M3F71)
NSHS Portsmouth (Attn: Clinical Nuclear Medicine School)

October 15, 2003

ALL AGREEMENT STATES, MINNESOTA, PENNSYLVANIA

**NRC REGULATORY ISSUE SUMMARY 2003-17: COMPLYING WITH 10 CFR 35.59,
RECENTNESS OF TRAINING (STP-03-080)**

This is to inform you that the U.S. Nuclear Regulatory Commission (NRC) issued Regulatory Issue Summary (RIS) 2003-17: Complying With 10 CFR 35.59, Recentness of Training, For Board-Certified Individuals Whose Training and Experience Were Completed More Than 7 Years Ago.

This RIS provides guidance for licensees and permittees seeking to have individuals identified as authorized users (AUs), authorized medical physicists (AMPs), and authorized nuclear pharmacists (ANPs), under the following conditions:

1. The individual is certified by a specialty board recognized by NRC, but the board certification was received beyond the 7-year time frame allowed in 10 CFR 35.59; and
2. The individual is not currently identified on a medical-use license nor permit as an AU, AMP, or ANP, as appropriate in 10 CFR 35.13(b)(4).

This RIS: (1) clarifies that for limited-specific, Type B broad-scope, and Type C broad-scope medical-use licensees, **only NRC with input from the Advisory Committee on the Medical Uses of Isotopes (ACMUI)**, as necessary, may determine what constitutes adequate related continuing training and experience, for purposes of complying with 10 CFR 35.59, Recentness of Training; (2) describes the criteria NRC uses to evaluate related continuing training and experience, under 10 CFR 35.59; (3) describes the information NRC reviews to make the determination; and (4) describes NRC's expectations for Type A broad-scope medical-use licensees.

This RIS may be accessed on ADAMS at: ML032740075 or on the NRC Website at: www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2003

If you have any questions on this correspondence, please contact me or the individual named below.

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/RA by Cardelia H. Maupin for/

Paul H. Lohaus, Director
Office of State and Tribal Programs

Enclosure (1)